

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2020-106-A

**SUMMARY OF COMMENTS OF THE SOUTH CAROLINA STATE CONFERENCE OF
THE NAACP, SOUTH CAROLINA COASTAL CONSERVATION LEAGUE,
SOUTHERN ALLIANCE FOR CLEAN ENERGY, AND UPSTATE FOREVER**

The South Carolina State Conference of the NAACP, South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Upstate Forever appreciate this opportunity to provide comments to the Commission on opportunities to counteract the far-reaching economic and other impacts of the COVID-19 crisis. Our comments focus on three issues: 1) disconnections, data collection, and arrearage management; 2) near-term options for utilities to adjust their energy efficiency (“EE”) programs while still protecting the health and safety of customers, utility employees, and contractors; and 3) the importance of expanding those programs, particularly for low-income customers, to mitigate the long-term economic impacts of the COVID-19 pandemic.

Disconnections, Data Collection, and Arrearage Management

To begin, we would like to commend the Commission and South Carolina utilities for acting swiftly at the start of the pandemic to suspend customer disconnections. However, we believe the Commission’s decision to begin allowing disconnections again is premature and that flexible payment plans and referring customers to local assistance organizations may be insufficient to deal with the magnitude of the crisis at this time. As Duke Energy Progress and Carolinas noted in their joint comments, the number of Duke customers in 60-day arrearages more than doubled from the end of February through the end of April.

We appreciate that many utilities in South Carolina recognize the hardship that many customers face, and thus have not yet resumed customer disconnections or late payment charges. We believe these practices should remain suspended until utilities and the Commission more fully understand the economic impacts of COVID-19 on utility customers and potential means to address them. As we provided in our full comments, national organizations such as the National Association of State Utility Customer Advocates and the National Consumer Law Center have provided recommendations for the types of data collection and planning that should be undertaken before utility disconnections should resume. As such, we respectfully request that the Commission revisit its earlier decision to allow disconnections at this time.

Near-Term “Pivots” for Utility Energy Efficiency Programs

While suspension of disconnections, bill payment assistance and arrearage management plans are critically important, energy efficiency programs offer a proven solution for households struggling to pay their electricity bills. But due to health and safety concerns, many utilities, including some South Carolina utilities, have temporarily suspended certain efficiency programs that require in-home visits. As a result, utilities across the country and leading energy efficiency organizations have been working to identify program adjustments and creative solutions that would allow utilities to continue delivering much-needed energy saving programs to households while protecting the health and safety of utility staff, contractors and their customers.

For instance, some utilities have begun to offer some programs, such as energy audits and customer education and outreach efforts, virtually or over the phone. Other utilities have begun or expanded their use of “self-install kits” that include measures such as LED bulbs, faucet aerators, and power strips that can be shipped to customers to install on their own. And in some cases, utilities have resumed programs with the use of additional personal protective equipment and health and safety measures.

Utilities can also use this time to identify and provide information about energy efficiency programs to customers that may be good candidates for programs when they resume at a later date. For example, after Florida utility JEA halted its low-income neighborhood program, the utility compiled a list of customers in eligible census tract neighborhoods, sorted that list by electricity consumption, and developed associated scripts to use for customer outreach and support. Utilities should also seek innovative opportunities to advance their savings goals, such as reaching out to owners of vacant or under-used commercial buildings to offer efficiency analysis and upgrades. This approach would both meet program energy savings goals and provide jobs and a better footing for economic recovery.

Finally, utilities should plan to roll over any unspent EE program funds to use once programming resumes. We recognize that regulatory approvals could be necessary to effectuate some of these recommendations, and request that the Commission allow utilities the needed flexibility to adapt their programs so they can continue to be offered in the near term.

Expanding Energy Efficiency Programs to Aid in Long-Term Recovery

Finally, expanding access to comprehensive energy-efficiency upgrades is necessary to reduce the high energy burdens that are borne by many low- to moderate-income South Carolina households—which have only been exacerbated by the current pandemic and associated economic crisis. Options to expand energy efficiency programs in the long term could include on-bill financing or on-bill tariff programs, the use of voluntary bill “round-up” programs to increase energy efficiency funding, or developing a streamlined, single-step application process for low-income residents to apply for services such as Low Income Home Energy Assistance Program (LIHEAP), Weatherization Assistance Program (WAP), and home rehabilitation. The Commission should also consider its role in encouraging utilities to meet savings goals through the use of energy efficiency programs.

We thank the Commission for the opportunity to provide these comments regarding measures that can be taken to mitigate the impacts of COVID-19 crisis on utility customers.

Respectfully submitted,

s/ Kate Lee

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STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2020-106-A

In the Matter of:

Actions in Response to COVID-19

CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of the Summary of Comments filed on behalf of South Carolina State Conference of the NAACP, South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Upstate Forever by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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